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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO.: CV 20-7811 RS
)	
Plaintiff,)	UNITED STATES' ADMINISTRATIVE MOTION
)	FOR LEAVE TO FILE UNDER SEAL EXHIBITS
v.)	SUBMITTED IN SUPPORT OF ITS OPPOSITION
)	TO NOBUAKI KOBAYASHI'S MOTION FOR
Approximately 69,370 Bitcoin (BTC), Bitcoin)	DIRECT ACCESS AND INTERVENTION
Gold (BTG), Bitcoin SV (BSV), and Bitcoin)	
Cash (BCH) seized from)	
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx)	
<u>Defendant.</u>)	

Pursuant to Local Rule 79-5, the United States of America ("the government"), by and through its counsel, Assistant United States Attorney Claudia Quiroz, moves this Court for an order for leave to file under seal Exhibits 1 and 2 attached to the Declaration of Michael Gronager in Support of the United States' Opposition to Nobuaki Kobayashi's Motion for Direct Access and Intervention.

The government respectfully requests that Exhibits 1 and 2 be filed under seal. The reasons for this request are that the exhibits contain information related to an ongoing investigation, which could be compromised if they are made public. Furthermore, Exhibit 1 reveals proprietary methods and

ADMINISTRATIVE MOTION FOR SEALING ORDER

1 technologies of Chainalysis, Inc. that should not be in the public domain.

2 For the foregoing reasons, the United States requests that the Court grant this request and order
3 Exhibits 1 and 2 attached to the Declaration of Michael Gronager in Support of the United States'
4 opposition to Nobuaki Kobayashi's Motion for Direct Access and Intervention to be filed under seal,
5 except that the Clerk of Court shall provide copies of the sealed documents to employees of the United
6 States Attorney's Office. The United States further requests that the United States Attorney's Office be
7 permitted to share these documents with counsel for Nobuaki Kobayashi and as necessary to comply
8 with its discovery obligations.

9 DATED: May 7, 2021

Respectfully submitted,

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11 Acting United States Attorney

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